

# Federal Defenders OF NEW YORK, INC.

Southern District  
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July 28, 2021

**BY ECF**

Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

7/30/2021  
Bail conditions are modified (✓) as  
requested so include  
Paul A. Crotty  
JSD

**Re: United States v. Baudilio Reyes  
20 Cr. 507 (PAC)**

Dear Judge Crotty,

With the consent of the Pretrial Services Agency, I respectfully write on behalf of my client, Baudilio Reyes, to request that he be removed from home detention and placed on curfew enforced by electronic monitoring. PTS officer John Rothman does not object to this modification. The Government defers to Pretrial on this application. ✓

On 7/30/2020, the following bail conditions were set for Mr. Reyes by Judge Cave: \$50,000 PRB; 2 FRP'S; Travel Limited to SDNY/EDNY & ED PA (& Points in Between for Travel to/from Court); Surrender Travel Documents (& No New Applications); Pretrial Supervision As Directed by PTS; Deft to Submit to Urinalysis, If Positive, Add Condition of Drug Testing/Treatment; Home Incarceration; Electronic Monitoring; Deft to Continue or Seek Employment; Deft Not to Possess Firearm/Destructive Device/Other Weapon. On 8/31/2020 Judge Cott modified Mr. Reyes' bail from home incarceration to home detention. Since then, Mr. Reyes has been employed and has abided by all the conditions of his bond.

Mr. Reyes is a single father who is struggling to spend time with his daughters and run errands for them under home detention. The requested modification would allow him to continue working and spend time with his children outside of the home. As noted above, Pretrial consents to his modification and the Government defers to Pretrial.

Respectfully submitted,  
/s/  
Zawadi Baharanyi  
Assistant Federal Defender

cc: Benjamin Schrier (ECF).